

David J. Bradley, Clerk of Court

“MEJIA,” and MARLON MIRANDA-MORAN, A/K/A “CHINKI,” were members and associates of the violent international street gang Mara Salvatrucha, also known as “MS-13.”

2. MS-13 is a violent international street gang involved in a variety of violent criminal activities, including murder and attempted murder, in the Southern District of Texas and elsewhere. MS-13 members and associates are located throughout the United States, including Texas, Virginia, Maryland, New York, and California. MS-13 also has a large international presence in El Salvador and Honduras.

3. MS-13, including its leaders, members, and associates, constitutes an enterprise, as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact which engages in, and the activities of which affect, interstate and foreign commerce. The enterprise constitutes an ongoing organization whose members function as a continuing unit for a common purpose of achieving the objectives of the enterprise.

4. MS-13, through its leaders, members, and associates, engages in racketeering activity, as defined in Title 18, United States Code, Section 1959(b)(1) and Section 1961(1), namely, acts involving murder, in violation of Texas state law, and acts indictable under Title 18, United States Code, Sections 1512 and 1513 (obstruction of justice).

Structure of the Enterprise

5. MS-13 recruits members and associates predominantly from the Hispanic community, typically juveniles. Within MS-13, the primary unit of organization is known as a “clique,” which typically includes 10 to 100 members and operates in a specific geographic location. Each clique is run by the senior leader, who is designated the “First Word,” and the second-in-command, who is designated the “Second Word.” The other members and associates of the clique take their orders from the “First Word” or “Second Word.” The leaders of the

respective cliques attend larger general meetings to manage gang operations on a regional and international level.

6. Individuals who associate and commit crimes with the gang are called “paisas,” “paros,” or “observaciones.” Individuals who are attempting to join the gang are called “chequeos” or “cheqs.” Chequeos undergo a probationary period during which they are required to commit crimes on behalf of MS-13 to achieve trust and prove their loyalty to the gang. To join MS-13 and become full members or “homeboys,” prospective members are required to complete an initiation process, often referred to as being “jumped in” or “beat in” to the gang. During that initiation, other members of MS-13 will beat the new member, usually until a gang member is finished counting aloud to the number thirteen, representing the “13” in MS-13.

7. MS-13 members must attend clique meetings. A member is usually required to pay dues to the clique leaders. The money is used to finance clique activities, to provide support for clique members who are in jail, and to fund the MS-13 enterprise in El Salvador where many of the top gang leaders are based.

8. To promote their gang identity, MS-13 members and associates often wear blue or white clothing, as well as clothing displaying the number “13” or numbers that total 13, such as “76.” MS-13 members and associates also often have tattoos reading “Mara Salvatrucha,” “MS,” or “MS-13,” and mark their territory with graffiti displaying the names and symbols associated with the gang. One such symbol is the MS-13 hand sign, meant to resemble both an inverted “M” and the face of the devil, with outstretched fingers representing the devil’s horns.

9. In order to protect the power, reputation, and territory of MS-13, members and associates are required to use violence, threats of violence, and intimidation. These acts of violence

often include murder and assault with deadly weapons, including machetes. MS-13 members and associates maintain and enhance their status in the gang by participating in such violent acts.

10. MS-13 recruits are indoctrinated into MS-13 rules, which are ruthlessly enforced. One prominent rule encourages MS-13 members and associates to confront, fight, and kill rival gang members, known as “chavalas.” Mara 18 or 18th Street Gang are known rivals to MS-13 in the Southern District of Texas.

Purposes of the MS-13 Enterprise

11. The purposes of the MS-13 enterprise include the following:
- (a) Preserving, expanding, and protecting the power, territory, and reputation of MS-13 through the use of violence, threats of violence, and intimidation;
 - (b) Promoting and enhancing MS-13 and the activities of its members and associates by committing crimes, including but not limited to, murder;
 - (c) Keeping victims, potential victims, and community members in fear of MS-13 and its members and associates through violence, threats of violence, and intimidation;
 - (d) Confronting and retaliating against rival gangs through the use of violence, threats of violence, and intimidation;
 - (e) Ensuring discipline within the enterprise and compliance with the enterprise’s rules by members and associates through threats of violence and acts of violence;
 - (f) Enriching the members and associates of the enterprise through criminal activity, including robbery, extortion, and narcotics trafficking;
 - (g) Hindering and obstructing efforts of law enforcement to identify, apprehend, and successfully prosecute offending gang members; and
 - (h) Providing financial support and information to MS-13 members, including those incarcerated in the United States and El Salvador.

Methods and Means of the MS-13 Enterprise

12. Among the methods and means by which MS-13 members and associates conduct and participate in the conduct of the affairs of the enterprise are the following:

- (a) MS-13 members and associates use violence, threats of violence, and intimidation, including murder, attempted murder, robbery, kidnapping, and assault, to preserve, protect, and expand the enterprise's territory and criminal operations and to enhance its prestige, reputation, and position in the community;
- (b) MS-13 members and associates promote a climate of fear through violence, threats of violence, and intimidation, including against members of rival gangs;
- (c) MS-13 members and associates use violence, threats of violence, and intimidation to discipline and punish members and associates who violate enterprise rules;
- (d) MS-13 members and associates use telephones to discuss gang-related business and to obtain approval for the use of violence to further the purposes of MS-13;
- (e) MS-13 members and associates use, attempt to use, and conspire to use robbery, extortion, and narcotics trafficking as a mechanism to obtain money; and
- (f) MS-13 members and associates collect dues to send to MS-13 members incarcerated in the United States and El Salvador and to MS-13 leadership in El Salvador, in an effort to provide financial support to the enterprise.

Murder in Aid of Racketeering

13. On or about June 6, 2018, in the Southern District of Texas, and elsewhere,

FRANKLIN TREJO-CHAVARRIA, A/K/A "IMPULSIVO,"

WILSON JOSE VENTURA-MEJIA, A/K/A "DISCRETO," A/K/A "DISCO,"

JIMMY VILLALOBOS-GOMEZ, A/K/A "DUCHI," A/K/A "DUCHY,"

ANGEL MIGUEL AGUILAR-OCHOA, A/K/A "DARKI,"

WALTER ANTONIO CHICAS-GARCIA, A/K/A "WALTER," A/K/A "MEJIA," and

MARLON MIRANDA-MORAN, A/K/A "CHINKI,"

and others known and unknown, while aiding and abetting each other, for the purpose of gaining entrance to, and maintaining and increasing position in, MS-13, an enterprise engaged in racketeering activity, did intentionally and knowingly murder Victor Castro-Martinez, in violation of Texas Penal Code, §§ 19.02, 7.01, and 7.02.

In violation of 18 U.S.C. §§ 1959(a)(1), 2.

COUNT TWO

(Conspiracy to Commit Murder in Aid of Racketeering)

14. The allegations contained in Paragraphs 1 through 12 of Count One of this Indictment are realleged and incorporated by reference as though fully set forth herein.

15. Beginning in or about March 2018, and continuing to on or about June 6, 2018, in the Southern District of Texas, and elsewhere,

FRANKLIN TREJO-CHAVARRIA, A/K/A “IMPULSIVO,”

WILSON JOSE VENTURA-MEJIA, A/K/A “DISCRETO,” A/K/A “DISCO,”

JIMMY VILLALOBOS-GOMEZ, A/K/A “DUCHI,” A/K/A “DUCHY,”

ANGEL MIGUEL AGUILAR-OCHOA, A/K/A “DARKI,”

WALTER ANTONIO CHICAS-GARCIA, A/K/A “WALTER,” A/K/A “MEJIA,” and

MARLON MIRANDA-MORAN, A/K/A “CHINKI,”

for the purpose of gaining entrance to, and maintaining and increasing position in, MS-13, an enterprise engaged in racketeering activity, did intentionally and knowingly conspire and agree with each other and others known and unknown to murder Victor Castro-Martinez, in violation of Texas Penal Code, §§ 19.02 and 15.02.

In violation of 18 U.S.C. § 1959(a)(5).

A TRUE BILL:

Original Signature on file

FOREPERSON OF THE GRAND JURY

**RYAN K. PATRICK
UNITED STATES ATTORNEY**

BY: _____

**Britni Cooper
John M. Lewis**

Assistant United States Attorneys

**DAVID L. JAFFE
CHIEF, ORGANIZED CRIME AND GANG SECTION,
UNITED STATES DEPARTMENT OF JUSTICE**

BY:

**Gerald Collins
Julie Finocchiaro
Matthew Hoff
Trial Attorneys**